



MURIEL GOODE-TRUFANT  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**Laura C. Williams**  
Assistant Corporation Counsel  
Phone: (212) 356-2435  
E-mail: lawillia@law.nyc.gov  
*E-mail Not For Service*

December 11, 2024

**Via ECF**

Honorable Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Application GRANTED. Defendant shall respond by February 10, 2025. SO ORDERED.** The Clerk of Court is respectfully directed to terminate ECF No. 7.

**Dated: December 12, 2024**  
**New York, New York**

**Dale E. Ho**  
**United States District Judge**

Re: *Kenneth Frilando v. City of New York*  
No. 24-cv-08650 (DEH)

Dear Judge Ho:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for defendant City of New York ("City" or "Defendant") in the above-referenced action. Defendant writes, pursuant to Rule 2.e of the Court's Individual Rules and Practices in Civil Cases, to respectfully request a 60-day extension of time, from December 12, 2024 to February 10, 2025, for Defendant to respond to the complaint. This is Defendant's first request for an extension of time to respond to the complaint, and Plaintiff's counsel consents to this request.

Defendant apologizes for the lateness of this request. This extension is requested to provide this Office with sufficient time to assign this case to an attorney to handle going forward, investigate the numerous allegations contained in the complaint, and prepare an appropriate response. The requested extension will not affect any other deadlines.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/

Laura C. Williams  
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)